RESPONSE UNDER 37 C.F.R § 1.111
Serial Number:10/674,327
Filing Date: September 29, 2003
Title: USER AND GROUP ACTIVITY EXCLUSION VIA OBJECT CLASS DEFINITION TAILORING

Page 6
Dkt: 2058.233US1

REMARKS

This responds to the Office Action dated January 21, 2009.

No claims amended, canceled, or added; as a result, claims 1, 3-12, and 14-16 remain pending in this application.

§ *103 Rejection of the Claims*

Claims 1, 3-9, 11-12 and 14-16 were rejected under 35 U.S.C. § 103(a) as being obvious over Powers et al. (U.S. Patent No. 6,901,426; hereinafter "Powers") in view of Hansen et al. (U.S. Patent No. 6,886,016; hereinafter "Hansen"), and in view of Microsoft Computer Dictionary Fifth Edition (Microsoft Press, 2002)(hereinafter "Microsoft").

The rejection of independent claim 1 is premised on definitions of *instantiate* and *class* with regard to object oriented design where a child object inherits properties from a parent object as provided in Microsoft. In particular, the Office Action asserts in the *Response to Arguments* section on page 11 that the Microsoft definitions would have motivated a combination of Hansen and Powers where Hansen teaches tailoring an object class definition and Powers teaches the specified user permissions. Applicant does not traverse that Hansen teaches objects or that Powers teaches privileges. However, Applicant respectfully traverses that the combination would have provided claim 1. Applicant further asserts that Powers teaches away from the inventive contributions embodied in Independent claim 1.

First, if Hansen and Powers were to be combined according to the asserted motivation of Microsoft, the combination would not have provided claim 1. For example, claim 1 is directed in part to receiving user input for tailoring an object class definition including first and second fields; first and second users or groups of users, and associations of users or groups of users to the first and second fields. As claimed, these items are all included within the tailored object class definition.

In contrast, Hansen describes objects and classes as in typical object oriented analysis and design. Powers describes user privileges stored in a table as illustrated in FIG. 4 as cited in the Office Action. The description of FIG. 4 beginning at col. 7, line 41 describes the privilege tables **84** that include a user view table **140**, a class of service assignment table **142**, and a class

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Page 7
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of service template table **144**. Further, Powers at col. 8, lines 52-53 provides, "This is used to generate a custom class of services for the user rather than a service template." However, what is missing in this combination is the embedding of the first and second users in the claimed tailored object class definition in association with the respective first and second fields as set forth in independent claim 1. Instead, the permissions of Powers are stored it the privilege tables **84** rather than in the claimed tailored object class definitions.

Thus, if Powers and Hansen were to be combined according to the asserted motivation of Microsoft, the combination would result in objects of Hansen with access privileges defined in privilege tables of Powers from which user privileges would be retrieved. Contrary to this combination, claim 1 provides a tailored object class definition including user permissions within the tailored object class definition.

Further, the embedding of user access privileges in a tailored object class definition of claim 1 is contrary to the explicit statement of Powers at col. 7, lines 37-39 which provides, "In this way, access privileges may be easily updated and maintained for the user in response to changes in allowed services or organizational structure." The ease of updating and maintaining in Powers is provided though maintenance of privileges in tables rather than in code. Maintaining privileges in the tailored object class definitions would not provide tables from which user privileges could be updated through simple database update techniques. Instead, tailored object class definitions would need to be updated in the event privileges needed to be modified. One of skill in the relevant art would readily realize that this is a more time consuming, labor intensive process. Thus, Applicant respectfully submits that not only would the proposed combination of Powers and Hansen as motivated by Microsoft fail to provide claim 1, Powers discourages one of ordinary skill in art from taking the direction chosen by Applicants of defining tailored object classes with permissions data embedded therein.

Accordingly, Applicant respectfully submits that independent claim 1 is patentable over the asserted combination of Powers and Hansen as motivated by Microsoft. Claims 3-9, 11-12, and 14-16 depend, directly or indirectly, from patentable independent claim 1 and are patentable for at least the same reasons.

Claim 10 was rejected under 35 U.S.C. § 103(a) as being obvious over Powers in view of Hansen, in view of Microsoft, and in view of Keinsley et al. (U.S. Patent Application Publication No. 2003/0154403; hereinafter "Keinsley").

Keinsley is provided for purposes of showing the additional elements of claim 10. However, Keinsley fails to cure the deficiencies with regard to independent claim 1 from which claim 10 depends. Thus, Applicant respectfully submits that claim 10 is also patentable for at least the same reasons as independent claim 1.

Withdrawal of the 35 U.S.C. § 103(a) rejections and allowance of claims 1, 3-12, and 14-16 are respectfully requested.

CONCLUSION

Applicants respectfully submit that the claims are in condition for allowance, and notification to that effect is earnestly requested. The Examiner is invited to telephone the undersigned at (612) 373-6938 to facilitate prosecution of this application.

If necessary, please charge any additional fees or deficiencies, or credit any overpayments to Deposit Account No. 19-0743.

Respectfully submitted,

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Date __4/21/2009__   By _____

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CERTIFICATE UNDER 37 CFR 1.8: The undersigned hereby certifies that this correspondence is being filed using the USPTO's electronic filing system EFS-Web, and is addressed to: Mail Stop Amendment, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450 on April 21, 2009.

Dawn R. Shaw	/Dawn R. Shaw/
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